

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Integrated)
Resource Planning Standard as Required by) **Case No. EO-2009-0247**
Section 532 of the Energy Independence and)
Security Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(17) Rate Design)
Modifications to Promote Energy Efficiency) **Case No. EO-2009-0248**
Investments Standard as Required by Section)
532 of the Energy Independence and Security)
Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Consideration)
of Smart Grid Investments Standard as Required) **Case No. EO-2009-0249**
by Section 1307 of the Energy Independence and)
Security Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(17) Smart Grid)
Information Standard as Required by Section) **Case No. EO-2009-0250**
1307 of the Energy Independence and Security)
Act of 2007.)

**APPLICATION OF SOUTHWEST POWER POOL, INC.
TO INTERVENE**

COMES NOW Southwest Power Pool, Inc. ("SPP") and respectfully submits its Application to Intervene in the above referenced cases pursuant to 4 CSR 240-2.075. In support of its Application, SPP states as follows:

1. SPP is an Arkansas not-for-profit corporation with its principal place of business in Little Rock, Arkansas. Since 1968, SPP has functioned as a Regional Reliability Council of the North American Electric Reliability Corporation ("NERC").¹ Since

¹ Formerly the North American Electric Reliability Council.

January 1, 2005, SPP has functioned as a Federal Energy Regulatory Commission ("FERC") approved Regional Transmission Organization ("RTO") consistent with the terms of FERC Order No. 2000. And since February 1, 2007, SPP has operated a real-time Energy Imbalance Service Market ("EIS Market"), which provides real-time Locational Imbalance Prices ("LIP") at relevant nodes in the SPP EIS Market.

2. SPP currently has fifty-three members serving more than 4.5 million customers in a geographical area of 255,000 square miles covering all or part of the States of Arkansas, Kansas, Louisiana, Missouri, New Mexico, Nebraska, Oklahoma, Texas, and Mississippi.² A list of SPP's members is attached hereto as Attachment 1. SPP's membership includes twelve investor-owned utilities, nine municipal systems, eleven generation and transmission cooperatives, four state authorities, four independent power producers, eleven power marketers, and two independent transmission companies. SPP also has one contract participant.

3. The Empire District Electric Company ("EDE"), Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company, formerly Aquila, Inc. ("KCP&L-GMO"), are members of SPP. SPP serves as a Transmission Provider pursuant to the terms of a FERC-approved Open Access Transmission Tariff ("OATT"). EDE and KCP&L transferred functional control of their transmission assets to SPP pursuant to this Commission's Orders in Case Nos. EO-2006-0141 and EO-2006-0142, respectively. Both EDE and KCP&L participate in SPP's EIS Market, which began operation in February, 2007. KCP&L-GMO has recently filed an application to this Commission to transfer functional control of its transmission assets to SPP in Case

² This information has not been updated to include the very recent addition of certain Nebraska entities.

No. EO-2009-0179. KCP&L-GMO's application is now pending before this Commission.

4. Pleadings, notices, orders and other communications pertaining to this application and the above referenced cases should be addressed to the undersigned counsel as well as to:

Heather Starnes
Manager, Regulatory Policy
Southwest Power Pool, Inc.
415 North McKinley, Suite 140
Little Rock, Arkansas 72205-3020
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5. As a functioning RTO, SPP is the sole provider of transmission service for those entities that have transferred functional control of their transmission assets to SPP, as prescribed by FERC Order No. 2000.³ As the transmission provider, SPP has a responsibility for the planning and operation of the regional transmission grid. As the Commission is aware, the electric delivery infrastructure is a complex system for which the construction and operation of generation, demand response and energy efficiency facilities affect the design and operation of the transmission system. Likewise, the operation of generation and demand response resources affect the functioning of the EIS Market. Thus SPP has an interest in its members' integrated resource planning process and their rate design as these matters affect the planning and operation of the regional transmission system and the EIS Market. And as the operator of this transmission grid and EIS Market, SPP is vitally interested in Smart Grid Investment Standards and Smart Grid Information Standards. This interest is different from that of the general public, an

³ See *Southwest Power Pool, Inc.*, 106 FERC ¶ 61,110, at P 109 (2004).

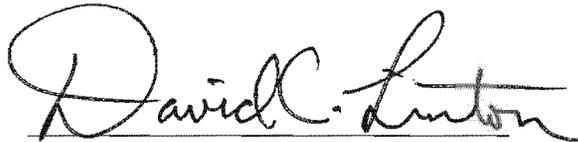
interest that could be adversely affected by the Commission's determination in these cases.

6. In addition, granting SPP's Application in these cases is in the public interest in that SPP will be able to provide the Commission its perspective on day-to-day operation of the regional transmission grid, transmission system planning, EIS Market operations, and Smart Grid components.

7. Due to the status of the cases before the Commission, SPP is unable to state a position at this time.

WHEREFORE, SPP respectfully requests that the Commission grant this Application to Intervene.

Respectfully submitted,

A handwritten signature in black ink that reads "David C. Linton". The signature is written in a cursive style with a large, looped initial "D".

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Attorney for Southwest Power Pool, Inc.

Dated: January 9, 2009

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Application of Southwest Power Pool, Inc. to Intervene was e-mailed on this 9th day of January, 2009, to the persons on the Commission's service list in this case.

A handwritten signature in black ink that reads "David C. Linton". The signature is written in a cursive style with a large, circular initial "D".

David C. Linton

SPP Members

- * Transmission Dependent Member
- # Balancing Authority/Control Area within SPP
- ^ Transmission Owner

Cooperatives

- Arkansas Electric Cooperative Co *
- East Texas Electric Coop., Inc. *
- Golden Spread Electric Cooperative *
- Kansas Electric Power Coop
- Mid-Kansas Electric Company ^
- Midwest Energy, Inc. * ^
- Northeast TX Electric Cooperative *
- Rayburn Country Electric Coop *
- Sunflower Electric Power Corp. * # ^
- Tex - La Cooperative of Texas, Inc. *
- Western Farmers Electric Coop. # ^

Independent Power Producers

- Calpine Energy Services, L.P. *
- Dogwood Energy, LLC *
- Entergy Power Ventures, LP
- Tenaska Power Services Co. *

Independent Transmission Companies

- ITC Great Plains
- Trans-Elect Development Company, LLC

Investor-Owned

- American Electric Power #
- Public Service Company of Oklahoma ^
- Southwestern Electric Power Company ^
- Aquila, Inc. ^
- Missouri Public Service #
- St. Joseph Power & Light Co. *
- Cleco Power, LLC #
- Empire District Electric Company # ^
- Entergy Services, Inc. *
- Exelon Power Team *
- Kansas City Power & Light Company # ^
- OG+E Electric Services #
- Westar Energy, Inc. # ^
- Kansas Gas and Electric Company ^
- Xcel Energy
- Southwestern Public Service Company # ^

Marketers

Aquila Power - Aquila Inc. *
Cargill Power Markets LLC *
Constellation Energy Commodities Group, Inc. *
Coral Power LLC *
Duke Energy Americas, LLC *
Dynergy Power Marketing, Inc. *
Edison Mission Marketing & Trading, Inc. *
El Paso Merchant Energy, L.P. *
Luminant Energy Company, LLC
NRG Power Marketing, Inc *
Williams Power Company, Inc. *

Municipals

Board of Public Utilities (Kansas City, KS) * #
City of Clarksdale, Mississippi *
City of Lafayette, LA * #
City Power and Light (Independence, MO) * #
City Utilities of Springfield, MO *
Kansas Municipal Energy Agency *
Lincoln Electric System *
Oklahoma Municipal Power Authority
Public Service Comm. of Yazoo City, MS *

SPP Contract Participants

Southwestern Power Administration #

State Agencies

Grand River Dam Authority # ^
Louisiana Energy & Power Authority #
Nebraska Public Power District *
Omaha Public Power District *